

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MOMENTIVE SPECIALTY CHEMICALS, INC.
f/k/a Hexion Specialty Chemicals, Inc., f/k/a Borden
Chemical, Inc., and MOMENTIVE QUIMICA DO
BRASIL LTDA., f/k/a Hexion Quimica Industria E
Comercio Ltda. f/k/a Hexion Quimica Industria E
Comercio S.A. f/k/a Borden Quimica Industria E
Comercio, Ltda,

Plaintiffs,

vs.

CHARTIS SPECIALTY INSURANCE COMPANY
f/k/a American International Specialty Lines
Insurance Company, WILLIS NORTH AMERICA
INC., AON RISK SERVICES NORTHEAST, INC.,

Defendants.

Civil Action No.: 2:11-cv-583

Judge James L. Graham

Magistrate Judge E.A. Preston Deavers

**NOTICE OF CONSENT
PROTECTIVE ORDER
AND CONFIDENTIAL
UNDERTAKING
(Experts and Consultants)**

I hereby certify that I have been retained as a consultant or expert witness in the action entitled *Momentive Specialty Chemicals, Inc. v. Chartis Specialty Insurance Co., et al.*, Civil Action No. 2:11-cv-583-JLG -EPD, pending in the United States District Court, Southern District of Ohio.

I further certify my understanding that Confidential Information will be provided to me by counsel, pursuant to the terms and restrictions of the Consent Protective Order, entered by the United States District Court, Southern District of Ohio (the “Court”) in this action.

I further certify that I have been provided a copy of and have read and understand the Consent Protective Order, and hereby agree to fully comply with the Consent Protective Order and all of its terms and restrictions as such shall apply to me. I further agree to subject myself to

the jurisdiction of the Court for purposes of enforcement of the terms and restrictions of the Consent Protective Order. I further agree that I shall not disclose Confidential Information to anyone other than persons permitted to have access to such material or information pursuant to the terms and restrictions of the Consent Protective Order.

I further certify that upon the conclusion of my involvement in the litigation, I will return and/or destroy all Confidential Information that comes into my possession, and documents or things that I have prepared relating thereto, to counsel for the party by whom I am employed or retained except that if any Confidential Information is incorporated or referenced in any of my work product, such work product is not required to be returned or destroyed, but will continue to be treated as Confidential Information..

I understand that violation of the Consent Protective Order may be punishable by contempt of Court.

Dated: _____, 2012

(Signature)

Print Name